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Via ECF

October 20, 2022

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570 (GBD) (SN); *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*, 04-cv-1076 (GBD)(SN); *Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN); Taliban Judgment Motions at ECF Nos. 8568, 8274

Dear Judge Netburn:

We write regarding Taliban judgment motions, *see* ECF Nos. 8568, 8274 (the “Motions”), filed on behalf of certain clients represented both by Kreindler & Kreindler and Anderson Kill (whose representation is limited solely to claims against the Taliban).

The following five (5) individual plaintiffs making claims for their solatium losses are included on both the Kreindler & Kreindler motion (filed July 27, 2022) and the Anderson Kill motion (filed September 28, 2022): Diane Genco, Janlyn Scauso, Laurie Spampinato, Kimberly Trudel, and Cella Woo-Yuen. *Compare* ECF No. 8275-3 (Exhibit B-1) at ¶¶ 189, 441, 459, 487, 515, *with* ECF No. 8615-1 (Exhibit A) at ¶¶ 2, 7, 11, 15, 17. At the time Anderson Kill filed its motion for partial final judgment against the Taliban (the “AK Motion”), we had informed Kreindler & Kreindler that we would include these five (5) individual claims in the AK Motion in the event the Court denied the Kreindler & Kreindler Taliban judgment motion (“Kreindler Motion”) as to these individual claims.

To avoid any possibility of duplicate judgments against the Taliban for these five (5) individual plaintiffs, we respectfully request that the Court disregard paragraphs 189, 441, 459, 487, and 515 in ECF No. 8275-3 (Exhibit B-1) when considering the Kreindler Motion. We thank the Court for its attention to this matter. We are also happy to take any additional steps the Court sees fit.

KREINDLER & KREINDLER LLP

ANDERSON KILL P.C.

/s/ Andrew J. Maloney, III
Andrew J. Maloney, III, Esq.

By: /s/ Jerry S. Goldman
Jerry S. Goldman

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Cc:

The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)